

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

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§
§

v.

No. 4:22CR 85
Judge Mazzant

ROBERT TODD WEST

FILED

APR 13 2022

Clerk, U.S. District Court
Texas Eastern**INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. §§ 2252A(a)(1)
and (b)(1) (Transportation of Child
Pornography)

On or about October 24, 2021, in the Eastern District of Texas, **Robert Todd West**, defendant, did knowingly transport any child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means and facility of interstate and foreign commerce, and in or affecting interstate and foreign commerce by any means, including by computer. Specifically, the defendant, **Robert Todd West**, using a social media application, the Internet, and digital devices that he owned and possessed did transport the following visual depiction:

FILE IDENTIFIER	DESCRIPTION
6982a8ce-907c-442c-a3e1-5a8212e-752cd.jpg	This image depicts a nude, prepubescent female who is lying on a bed and exposing her genitals to the camera, which is the focus of the image.

In violation of 18 U.S.C. §§ 2252A(a)(1) and (b)(1).

Count Two

Violation: 18 U.S.C. §§ 2252A(a)(1)
and (b)(1) (Transportation of Child
Pornography)

On or about October 26, 2021, in the Eastern District of Texas, **Robert Todd West**, defendant, did knowingly transport any child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means and facility of interstate and foreign commerce, and in or affecting interstate and foreign commerce by any means, including by computer. Specifically, the defendant, **Robert Todd West**, using a social media application, the Internet, and digital devices that he owned and possessed did transport the following visual depiction:

FILE IDENTIFIER	DESCRIPTION
48025f39-adf1-454b-915d-db53724e-787d.mp4	This 30-second video depicts a nude, prepubescent female who is standing and using her fingers to spread her genitals, exposing her genitals to the camera, which is the focus of the video.

In violation of 18 U.S.C. §§ 2252A(a)(1) and (b)(1).

Count Three

Violation: 18 U.S.C. §§ 2252A(a)(5)(B)
and (b)(2) (Possession of Child
Pornography)

On or about March 31, 2022, in the Eastern District of Texas, **Robert Todd West**, defendant, did knowingly possess material, namely, an Samsung model SM-T727A tablet computer, bearing serial number R32R7003BXE, that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), involving a

prepubescent minor and a minor who had not attained 12 years of age, that had been shipped and transported using any means and facility of interstate and foreign commerce; that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and that had been produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer. Included among the images and videos that the defendant, **Robert Todd West**, possessed were the following:

FILE IDENTIFIER	DESCRIPTION
9ec7fc81-1650-468f-ac3c-443be53d2df7.mp4	This 52-second video depicts a nude, prepubescent female laying on top of a nude, adult male who uses his penis to penetrate the prepubescent female's genitals.
1d3c8f56-9e48-4d8d-abf2-b6dad38d38cb.mp4	This 1-minute, 37-second video depicts a toddler-aged prepubescent male, nude from the waist down and laying on a bed. An adult female performs oral sex on the prepubescent male.
1346.jpg	This image depicts a nude, prepubescent female laying on a bed with her arms bound by restraints while an individual uses a vibrating object to stimulate the prepubescent female's genitals.
134f775b-39ab-4250-a0ea-29361af4fa71.mp4	This 1-minute, 32-second video depicts a prepubescent female wearing a black collar performing oral sex on an animal. The video later shows the prepubescent female performing oral on an adult male while he digitally penetrates her genitals.

In violation of 18 U.S.C. § 2252A(a)(5)(B) and (b)(2).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Upon conviction of the offense(s) alleged in this Indictment, the defendant, **Robert Todd West**, shall forfeit to the United States his interest in the following property, including, but not limited to:

1. Samsung model SM-T727A tablet computer, bearing serial number R32R7003BXE; and
2. Samsung Galaxy SM-G955U cellular phone; bearing IMEI number 355979081738789.

This property is forfeitable pursuant to 18 U.S.C. § 2253(a) based upon the property being:

1. any visual depiction described in section . . . 2252 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; or
3. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

By virtue of the commission of the offense alleged in this Indictment, any and all interest the defendant has in this property is vested in and forfeited to the United States pursuant to 18 U.S.C. §§ 2253(a)(1), (a)(2), and (a)(3).

A TRUE BILL



GRAND JURY FOREPERSON

BRIT FEATHERSTON
UNITED STATES ATTORNEY



MARISA J. MILLER
Assistant United States Attorney

Date: 4/13/22

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NOTICE OF PENALTY

Counts One and Two

Violation: 18 U.S.C. §§ 2252A(a)(1) and (b)(1)

Penalty: Imprisonment for not less than five years and not more than twenty years; but if the defendant has a prior conviction under this chapter, section 1591, chapter 71, chapter 109A, chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography or sex trafficking of children, such person shall be imprisoned for not less than fifteen years and not more than forty years; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$ 100.00

JVTA Assessment: \$ 5,000.00

Count Three

Violation: 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)

Penalty: Imprisonment for not more than ten years; but if any image of child pornography involved in the offense involved a prepubescent minor or a minor who had not attained 12 years of age, such person shall be imprisoned for not more than twenty years; and, if the defendant has a prior conviction

under this chapter, section 1591, chapter 71, chapter 109A, chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography or sex trafficking of children, such person shall be imprisoned for not less than ten years and not more than twenty years; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$ 100.00

JVTA Assessment: \$ 5,000.00